

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

)

Investigation by the Department on its own)

Motion into the Appropriate Regulatory Plan)

to succeed Price Cap Regulation for Verizon) D.T.E. 01-31

New England, Inc. d/b/a Verizon Massachusetts')

intrastate retail telecommunications services)

in the Commonwealth of Massachusetts)

)

VERIZON MASSACHUSETTS'

MOTION FOR EXTENSION OF TIME

Verizon Massachusetts ("Verizon MA") requests that the Department grant additional time for the filing of Verizon MA's regulatory plan in accordance with the Department's *Vote and Order* of February 28, 2001. The filing date for the proposed plan is currently scheduled for March 29, 2001. Verizon MA requests a two-week extension, until April 12, 2001, to make the filing. As grounds for its Motion, Verizon MA states as follows:

In its *Vote and Order*, the Department commenced an investigation to review the appropriate policy to succeed price cap regulation for Verizon MA's retail intrastate telecommunications services in Massachusetts and directed Verizon MA to file with the

Department within thirty (30) days from the date of the order, a proposed retail price plan for its Massachusetts intrastate operations. The Department stated that Verizon MA's proposal must include, at a minimum, the following:

- 1) a component for regulating or deregulating retail prices;
- 2) a plan for regulating service quality; and
- 3) a plan for intrastate access charge reform similar to that approved by the Federal Communications Commission ("FCC") for interstate charges.

Verizon MA has been preparing its proposal as required by the *Vote and Order* but needs a short extension to complete the filing. The proposal will be supported by testimony and analyses, which require more time to complete than allowed under the initial schedule. A brief extension is reasonable given the importance of the Department's investigation. Moreover, no potential party will be prejudiced since petitions to intervene are not due under the current schedule until April 17, 2001 - the week after the requested extension.

WHEREFORE, Verizon MA respectfully requests that the Department grant its request for a two-week extension of time.

Respectfully submitted,

VERIZON MASSACHUSETTS

By its attorneys,

Bruce P. Beausejour

185 Franklin Street, Room 1403

Boston, Massachusetts 02110-1585

(617) 743-2445

Robert N. Werlin

Keegan, Werlin & Pabian, LLP

21 Custom House Street

Boston, MA 02110

(617) 951-1400

Dated: March 26, 2001